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10/10/02

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA

SAMMI D. WRIGHT

Plaintiff

vs.

BEULAH HADRICK,
CHARLEEN SAZBO,
SCOTT SHREVE AND
RAY KENT,

CIVIL ACTION LAW

(JUDGE CONNER)

1:CV-00-1657

JURY TRIAL DEMANDED


FILED
HARRISBURG
OCT 10 2002
CLERK

PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME

- 1.) On or about October 14, 2002 plaintiffs Brief in Opposition to Defendants Motion for Summary Judgment is due.
- 2.) Plaintiffs counsel has a vacation scheduled until Friday October 10, 2002 through Monday, October 13, 2002 out of state.
- 3.) Counsel is requesting an enlargement of time until a date certain of Monday, October 21, 2002 to respond to Defendants Motion for Summary Judgment.
- 4.) Opposing counsel Assistant U.S. Attorney Kathy Frye, was personally contacted by plaintiffs counsel and she concurs in this motion.

WHEREFORE the Court is respectfully requested to grant plaintiff's enlargement of time until a date certain of Monday, October 21, 2002 to file plaintiff's response to defendants' motion for Summary Judgment.

Respectfully Submitted,


BAILEY STRETTON & OSTROWSKI
Don Bailey Esquire
4311 N. 6th Street
Harrisburg, PA 17110
(717) 221-9500

CERTIFICATE OF SERVICE

I, Don Bailey do hereby certify that on this 10th **DAY OF OCTOBER 2002** I served a true and correct copy of **PLAINTIFFS MOTION FOR ENLARGEMENT OF TIME** upon the attorneys below by First class-postage prepaid mail :

MARY CATHERINE FRYE ESQUIRE
ASSISTANT U.S. ATTORNEY
228 WALNUT STREET
HARRISBURG, PA 17110


Don Bailey Esquire